

EXHIBIT 2

In The Matter Of:

*Fair Fight Action v.
Raffensperger*

*Cam Thi Ashling
December 02, 2019*

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1 Q. Okay.

2 A. Yeah.

3 Q. What does that mean to be a community
4 leader for the Asian American community?

5 A. It means that you -- you know, you care
6 about your community and you've been helping people
7 through different roles for decades, or ten-year
8 plus.

9 Q. Okay. Not an official position, but an
10 informal sort of leadership role?

11 A. Yes. You know, like people see me as a
12 community leader in my community.

13 Q. Okay.

14 A. Mm-hmm (affirmative).

15 Q. And what is your community? Do you also
16 live in Gwinnett?

17 A. I came from Gwinnett. And I do a lot of
18 work in Gwinnett County, though I do live in
19 Buckhead now. But I consider Gwinnett my community
20 because we do a lot of work there.

21 Q. When you --

22 A. And my family still lives there.

23 Q. When you say "we do a lot of work," are
24 you referring to --

25 A. You know, the GAP PAC, the Asian American

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1 Advancing Progress PAC, we work in that area, which
2 is how I came to meet Ms. Tran because, you know,
3 Gwinnett County is a heavily populated Asian
4 American county with over 11 percent. So we try to
5 get our folks organized and to help them out with
6 all their issues.

7 Q. Okay. You live in Fulton County now?

8 A. Yes.

9 Q. How long have you lived in Fulton County?

10 A. Oh, I guess like nine years now. Nine
11 years.

12 Q. So you lived in Fulton County at the time
13 of the November 2018 --

14 A. Mm-hmm (affirmative).

15 Q. -- election?

16 A. Yes.

17 Q. Okay. What made you submit a declaration
18 in this case? I realize that's kind of a broad
19 statement.

20 A. Mm-hmm, mm-hmm (affirmative). So somebody
21 I knew was working for Fair Fight and was looking
22 for, you know, any kind of stories about people
23 having difficulties, you know, voting, and I had a
24 story. I'm like, well -- and they asked if I want
25 to submit my declaration of the story. I was like,

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1 on MVP, the My Voter Page?

2 A. Mm-hmm (affirmative). Yes, the Secretary
3 of State page.

4 Q. Okay. And am I correct that the My Voter
5 Page indicated to you that she was -- that her
6 registration was not active?

7 A. Yes.

8 Q. Okay.

9 A. And then it said to call the election
10 board to see what was wrong because it wouldn't say
11 what was wrong.

12 Q. Okay. So the My Voter Page just said
13 non-active?

14 A. Yeah. It's like not active or non-active
15 or pending or something, but it wasn't active.

16 Q. Okay.

17 A. And then it had a note on it to just to
18 call the election board for further assistance.

19 Q. Okay. But no reason was given on the
20 page? It didn't say, you know, citizenship or exact
21 match, something like that?

22 A. No. You had to call to find out what the
23 problem is, plus I don't want to guess, mm-hmm
24 (affirmative).

25 Q. Okay. Do you know when Mrs. Tran

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1 registered to vote, first registered to vote?

2 A. I don't know when.

3 Q. Do you know any of the details of her
4 registration, how she registered or what form she
5 used, et cetera?

6 A. No.

7 Q. Okay. Do you know when or how Mrs. Tran
8 became a U. S. citizen?

9 A. I don't know. I don't know. I think she
10 became a citizen like eight years ago or something,
11 seven, eight years ago or something. I'm not
12 totally sure, you know.

13 Q. Did she tell you and you don't remember,
14 or do you have any idea?

15 A. I mean, you know, because we had to go and
16 find her citizenship paperwork, but I wasn't going
17 to like invade her privacy more than I had to to
18 help her with her case to be looking at when she
19 became a citizen and all that stuff.

20 Q. Okay. So you didn't review the
21 naturalization papers you're referring to; is that
22 correct?

23 A. That's the job for the County.

24 Q. Okay.

25 A. So we just found it.

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1 Q. So --

2 A. Her husband found it.

3 Q. Okay.

4 A. And then we took it, and then we had to
5 drive all the way to Lawrenceville, which is like
6 across the county halfway. And then I knew she was
7 going to be hungry because it was going to be like a
8 long trip already. So we went to stop by and get
9 her some lunch before I drove her.

10 Q. Okay.

11 A. Yeah.

12 Q. What time of day did you meet Mrs. Tran?

13 A. I think it was closer to like 11:00-ish.

14 Q. Do you recall start to finish how much
15 time you spent from when you met her to when she
16 voted?

17 A. God. It was like hours. It was like
18 three or four hours from when I got there to, you
19 know, to calling, to trying to find naturalization
20 paper. Then trying to figure out where to go,
21 taking her to lunch and driving her there, and
22 waiting in line. And then, you know, getting the
23 person who needed to talk to, and then that person
24 calling the manager. And then the manager, you
25 know, is talking back to the person at the desk, the

1 admin. And then they changed the status. And then
2 we had to get into the other line to actually vote
3 and do, you know, regular voting. And then go
4 through all that, and then I got to drive her all
5 the way back home. So it was like my entire day.

6 Q. And you say that process took three to
7 four hours?

8 A. Yes.

9 Q. Okay.

10 A. Nobody should have to go through that much
11 to vote, especially an 80-year-old person.

12 Q. So in paragraph (e) -- or subparagraph (e)
13 of paragraph 3, I should say --

14 A. Mm-hmm (affirmative).

15 Q. -- Mrs. Tran's -- this is the last
16 sentence -- Mrs. Tran's husband found the paperwork
17 that the Gwinnett County Board of Elections required
18 her to have so that we could correct the State's
19 error and enable her to vote.

20 A. Mm-hmm (affirmative).

21 Q. You previously indicated that you're not
22 aware of, you know, the documents or the process or
23 what Ms. Tran did to register to vote; correct?

24 A. I'm not aware how she registered to vote,
25 but she apparently did successfully register to vote

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1 need to find out what it is.

2 Q. Sure. In subparagraph (g) you state: The
3 Board of Election staff informed us that Mrs. Tran's
4 voter status had been pending due to the exact match
5 issue with her name as well as her gender being
6 incorrectly reported.

7 A. Mm-hmm (affirmative).

8 Q. Do you know -- well, let me just say: Is
9 the terminology "exact match," is that what the
10 Gwinnett County Board of Elections told you?

11 A. No, that person did not say "exact match,"
12 but that's my understanding of their problem.

13 Q. Okay. What did they call it?

14 A. They said the spacing in her name was
15 wrong, and it was -- and that caused the problem.
16 It was entered in their system wrong.

17 Q. When you describe it as "exact match," do
18 you know what documents or what information is not
19 matching?

20 A. The space -- the spacing is not matching.

21 Q. Right. The spacing on -- I should say
22 what document is not matching the spacing on what
23 other document?

24 A. The -- her naturalization document is not
25 exactly matching on the State's database of

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1 registered voter document database. Those two
2 things are not matching exactly.

3 Q. You indicated that is the reason -- or
4 they told you that was the reason she had been put
5 in pending status?

6 A. Yes.

7 Q. And you indicate that she brought the
8 naturalization paperwork with her; correct?

9 A. Yes.

10 Q. So the naturalization paperwork that
11 didn't match what they had is the document that you
12 brought to prove her citizenship; is that correct?

13 A. Say it again.

14 Q. The -- you indicated that -- and maybe I'm
15 getting confused here, and I apologize if I'm
16 confusing you in turn. You indicated that the
17 Gwinnett County Board of Elections told you that the
18 naturalization documents did not match the voter
19 registration database; is that correct?

20 A. They said that her -- well, I mean, they
21 must have been matching another thing to know that
22 it wasn't matching; right?

23 Q. Well, that's my question.

24 A. Yeah.

25 Q. Do you know what the issues were -- if

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1 spacing problem in her name, how it was entered in
2 the system. And that to me sounds like the exact
3 match problem.

4 Q. Okay. So they used the term "spacing"
5 problem?

6 A. I don't know what -- they just said like
7 her name was not entered in correctly and there was
8 a space that was not in the right space, so it was a
9 spacing problem.

10 Q. I apologize if I'm beating a dead horse.

11 A. Mm-hmm (affirmative).

12 Q. I'm just trying to be clear as to what is
13 your, you know, assessment or description of the
14 issue, and what you were told by the election
15 officials specifically.

16 A. Mm-hmm (affirmative).

17 Q. Do you recall specifically what they said
18 the issue was?

19 A. They said it was her spacing. You know,
20 they may have said, you know, Ms. Tran's spacing was
21 not properly inputted or whatever in the system.
22 You should go and ask the election board people what
23 they do with all the spacing problems.

24 Q. So they said spacing of some sort?

25 A. They said the spacing of her name caused

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1 the problem in your system.

2 Q. Okay.

3 A. It wasn't a misspelling. It wasn't, you
4 know, a missing name of the four-part of her name.
5 It was the fact that it was just inputted in with
6 improper spacing.

7 Q. Okay. Do you know which document or which
8 source of information had the issue, whether that
9 was, you know, the voter database had the
10 misspelling, or the thing that they were matching it
11 to had the spacing issue, et cetera? Do you know?

12 A. Yeah, I don't know.

13 Q. Okay.

14 A. You know, I was behind the computer with
15 the person.

16 Q. Okay.

17 A. And the manager they had to call.

18 Q. And this is at the Election Board's
19 office?

20 A. This is the Gwinnett, yeah, Board of
21 Elections in Lawrenceville.

22 Q. You indicated you assisted Ms. Tran at the
23 DRA machine; correct?

24 A. Yes.

25 Q. Would Mrs. Tran have been able to fill out